

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS**

MARVIN BRANDON, RAFAEL
AGUILERA, ALDO MENDEZ-ETZIG,
individually and on behalf of all other
similarly situated,

Plaintiffs,

v.

3PD, INC.,

Defendant.

Case No. 13-CV-3745

Judge Ronald A. Guzman

Magistrate Judge Geraldine Soat Brown

**PLAINTIFFS' AGREED MOTION
FOR FINAL APPROVAL OF CLASS ACTION SETTLEMENT**

Plaintiffs, by and through Class Counsel, respectfully move this Honorable Court to grant final approval of the parties' class action settlement under Federal Rule of Civil Procedure 23(e). In support of their agreed motion, Plaintiffs also submit a Memorandum of Law, and further state:

1. On May 20, 2013, Plaintiffs filed their Complaint alleging that they were misclassified as independent contractors pursuant to the Illinois Wage Payment and Collection Act ("IWPCA"), 820 Ill. Comp. Stat. 115/1 *et seq.* The named Plaintiffs further alleged that as a result of this misclassification, Defendant violated the IWPCA by making unlawful deductions from their pay.
2. On October 1, 2015, the Court preliminarily approved the parties' class action settlement.
3. As set forth in greater detail in Plaintiffs' accompanying Memorandum of Law, the class action settlement is fair, reasonable, and adequate.

WHEREFORE, for the reasons set forth in Plaintiffs' accompanying Memorandum of Law, Plaintiffs respectfully request that this Honorable Court grant final approval of the parties' class action settlement.

Dated: January 22, 2016

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Respectfully submitted,

MARVIN BRANDON, RAFAEL
AGUILERA, and ALDO MENDEZ-
ETZIG, individually and on behalf of all
others similarly situated,

By: /s/ Bradley Manewith
Attorney for Plaintiffs

CERTIFICATE OF SERVICE

The undersigned, an attorney, hereby certifies that a copy of the attached, **Plaintiffs' Agreed Motion for Final Approval of Class Action Settlement**, was served upon the parties below by electronically filing with the Clerk of the U.S. District Court of the Northern District of Illinois and by electronic mail on January 22, 2016:

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Courtesy copies were delivered to Judge Guzman's Courtroom Deputy (Room 1218) within 24 hours of e-filing.

By: /s/ Bradley Manewith
Attorney for Plaintiffs